

Exhibit C

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

YELENA RUDERMAN,

19CV2987 (CBA)

Plaintiff,

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United States Courthouse
Brooklyn, New York

LAW OFFICE OF YURIY PRAKHIN,
P.C., and YURIY PRAKHIN, in
both his individual
and professional capacities.

December 19, 2022
2:00 p.m.

Defendants.

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TRANSCRIPT OF CIVIL CAUSE FOR PRETRIAL CONFERENCE
BEFORE THE HONORABLE CAROL B. AMON
UNITED STATES DISTRICT JUDGE

APPEARANCES:

FOR THE PLAINTIFF: FARUQI & FARUQI, LLP
685 THIRD AVENUE, 26TH FLOOR
NEW YORK, NEW YORK 10017
BY: INNESSA M. HUOT, ESQ.
ALEX J. HARTZBAND, ESQ.

TILTON BELDNER LLP
626 RXR PLAZA
UNIONDALE, NY 11556
BY: JOSHUA BELDNER, ESQ.

FOR THE DEFENDANTS: BOND SCHOENECK & KING, PLLC
600 THIRD AVENUE, 22ND FLOOR
NEW YORK, NEW YORK 10016
BY: MARY ELLEN DONNELLY, ESQ.
LOUIS DILORENZO, ESQ.
MALLORY A. CAMPBELL, ESQ.

Court Reporter: **SOPHIE NOLAN**

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Proceedings

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1 lying about that.

2 Is that going to be the defendants' position?

3 MS. DONNELLY: We are not claiming she lied about
4 her applications.

5 THE COURT: So I don't think we need to call those
6 witnesses.

7 MR. BELDNER: Okay. There is one more?

8 MS. HUOT: Levitsky is good but Grossman is out.

9 MR. BELDNER: Grossman is out.

10 THE COURT: Manessis is out you said. Sgouras is
11 out. Guaneri is out.

12 MR. BELDNER: Yes, sir.

13 THE COURT: Bogoraz is out. Shalom is out.

14 MS. HUOT: Yes, sir.

15 THE COURT: Tanya Ruderman is out.

16 MS. HUOT: Yes.

17 MR. BELDNER: Yes. There is one other witness
18 though, Your Honor, that we did not discuss, Peter Coates.

19 MS. HUOT: He is number 13 on page eight.

20 THE COURT: What is it that you want to -- because
21 I'm a little bit concerned about his testimony as a matter of
22 substance. What is it that you expect him to testify to?

23 MR. BELDNER: Well, Mr. Coates, and we acknowledge
24 he was not disclosed because we didn't know about him until
25 May of 2022, but Mr. Coates will testify that he was directed

1 by Mr. Prakhin and his office manager, Ms. Raskin, to delete
2 our client's Saga entry notes.

3 And one of the reasons -- one of the primary reasons
4 for the termination being proffered by the defendants was our
5 client's lack of Saga notes. And he will testify that he was
6 directed to delete her Saga notes and that when he said, no,
7 he observed other individuals, including the defendant -- an
8 individual listed in defendants' witness list, Mr. Pusachev go
9 in and manipulate Saga notes.

10 That's why his testimony is, we believe, crucial,
11 and we never had an opportunity to question Mr. Prakhin or
12 Ms. Raskin about this because this only came about after
13 summary judgment had been decided. We assume and we will
14 question them at trial about this. We assume they're going to
15 deny it and so Mr. Coates can certainly be offered to rebut or
16 impeach their testimony.

17 THE COURT: But what about the firm's culture of
18 unethical conduct, discrimination and retaliation, what is
19 that about?

20 MR. BELDNER: I don't believe that he would be
21 offering any kind of testimony regarding that. His testimony
22 would be limited to what he directly observed with respect to
23 actions taken with respect to our client and Saga entries and
24 the management of the Saga entries.

25 THE COURT: That's a pretty critical witness. From,